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9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**
11

12 CLINTON BROWN,

13 Plaintiff,

14 v.

15 CLARK R. TAYLOR, AICP, THE LOS
16 ANGELES COUNTY DEPARTMENT
17 OF REGIONAL PLANNING,

18 Defendant.
19

No. 2:22-09203-MEMF-KS

**[Proposed] Order Granting TRO &
[Proposed] Order to Show Cause Why a
Preliminary Injunction Should Not Issue
[ECF No. 185]**

20 Upon careful consideration of the Plaintiff's application for a Temporary Restraining Order
21 ("TRO") filed pursuant to Federal Rule of Civil Procedure 65, Local Rule 65-1, and Local Rule 7-19,
22 and upon review of the supporting evidence and arguments, the Court hereby finds as follows:

- 23 a. The Plaintiff has demonstrated a likelihood of success on the merits of his claims, or,
24 alternatively, that serious questions going to the merits have been raised.
25 b. The Plaintiff will suffer irreparable harm in the absence of immediate relief;
26 c. The balance of equities favors granting the requested relief; and
27 d. The public interest is served by upholding and ensuring compliance with constitutional
28 protections of property rights.

1 **IT IS HEREBY ORDERED** as follows:

2 **Issuance of Permits**

3 The Government is hereby **ORDERED** to issue the necessary permits for the construction of
4 200 housing units within **seven (7) days** of this Order. Compliance must meet all relevant statutory
5 and regulatory standards, and no further delay shall be imposed without explicit Court approval.

6 **Show Cause Order**

7 The Government is hereby **ORDERED** to appear before this Court on [], 2025, at
8 [], to show cause why it has refused to issue the permits for the 200 housing units and to
9 provide a written justification for its refusal by no later than [], 2025.

10 **Binding Nature of this Order**

11 This **ORDER** is binding upon the parties to this action, their officers, agents, employees,
12 attorneys, and all persons in active concert or participation with them who receive actual notice of this
13 Order.

14 **Acts Restrained or Required**

15 Pursuant to Federal Rule of Civil Procedure 65(d)(1)(C), this Order describes in reasonable
16 detail the specific acts required of the Government and does not rely on incorporation by reference.
17 The Government is specifically restrained from further delaying the issuance of the required permits
18 or otherwise impeding the Plaintiff's ability to commence construction of the 200 housing units.

19 **Temporary Restraining Order Duration**

20 This temporary restraining order shall remain in effect until [], 2025, or such later date
21 as extended by the Court or agreed upon by the parties. The Court further **ORDERS** that a hearing on
22 Plaintiff's application for a preliminary injunction shall take place on [], 2025, at [].
23 The Government is directed to serve and file its response to Plaintiff's application for a preliminary
24 injunction no later than [], 2025. Plaintiff shall serve and file any reply no later than [],
25 2025.

26 **Conclusion**

27 For the foregoing reasons, the Plaintiff's Motion for Temporary Restraining Order and Order
28 to Show Cause Why a Preliminary Injunction Should Not Issue is **GRANTED**.

IT IS SO ORDERED.

Dated: January __, 2025

MAAME EWUSI-MENSAH FRIMPONG

United States District Judge